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MEMO ENDORSED

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March 9, 2022

VIA EMAIL AND ECF

The Honorable Kenneth M. Karas
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: United States v. Andrew Perkins, 7:21-cr-00257-KMK-1

Dear Honorable Judge Karas:

I write to request an adjournment for the above captioned matter, which is currently scheduled for a status conference on Tuesday, March 15, 2022, at 11:30 a.m.

By way of background, Mr. Perkins was indicted on April 20, 2021, and arraigned on May 20, 2021. I took over the case from my predecessor, Susanne Brody, in July 2021. Since that time, there have been two prior status conferences. As Your Honor likely recalls, Mr. Perkins was given permission to move to Missouri to live with his mother in August 2021. *See* Doc. 23.

I am in the process of putting together a mitigation package to present to the government in the hopes of reaching a resolution in this matter. Those efforts have been complicated by the COVID-19 pandemic and Mr. Perkins being out of state. However, with the easing of COVID restrictions and the general improvement being made in controlling the virus, we have made significant efforts in the last few weeks in gathering materials that will be relevant to the mitigation package. Were we to proceed with the conference next week, I would be requesting a three-month adjournment to complete my mitigation package, to allow sufficient time for the government to review it, and hopefully allow the parties to reach a resolution in this matter.

I have spoken with Mr. Perkins about this request, and he has no objection to adjourning the conference. I have also discussed with him his rights under the Speedy Trial Act and he consent to the exclusion of time between this adjournment and the next court date to allow us sufficient time to gather and present a mitigation package on his behalf.

I have also discussed the instant request with Jennifer Ong, the Assistant United States Attorney assigned to this case. She has no objection to this request. Therefore, Mr. Perkins respectfully requests that the Court adjourn this matter for approximately three months for a status conference.

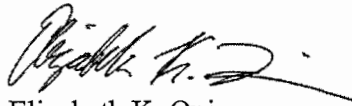
Granted. The 3/15/22 conference is adjourned to 6/15/22, at 10:00 Time is excluded until then, in the interests of justice, to allow Mr. Perkins to submit his mitigation presentation the the US Attorney's Office. The interests of justice from this exclusion outweigh the public's and Mr. Perkins' interests in a speedy trial. See 18 U.S.C. Section 3161(h)(7)(A).

So Ordered.

 3/14/22

cc: Jennifer Ong, A.U.S.A. (via email)

Respectfully submitted,



Elizabeth K. Quinn
Assistant Federal Defender
Attorney for Mr. Perkins